

PLEASE TAKE NOTICE that Robert S. Meloni and Thomas P. McCaffrey, of the law firm of Meloni & McCaffrey, P.C., will move this Court for an Order pursuant to Local Civil Rule 1.4 granting them leave to withdraw as counsel of record for Defendant/Counterclaimant and Third Party Plaintiff Celebrity Chefs Tours LLC (“CCT”) and Defendant Promark Productions LLC (“PP”) (hereinafter CCT and PP shall be referred to as “Defendants”), and for a stay of these proceedings until such time as Defendants retain substitute counsel.

Said motion shall be brought on October 1, 2010, in the United States District Court for the Southern District of New York (the Honorable Alvin Hellerstein, presiding) located at 500 Pearl Street, Courtroom 14D, New York, New York, on the grounds that there has been a complete breakdown in the attorney-client relationship and irreconcilable differences exist between Defendants and their counsel that has rendered it impossible for counsel to effectively represent Defendants further in this matter.

This motion is based on this application, the accompanying Declaration of Robert S. Meloni, Esq., all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at the time of any hearing hereon.

Dated: September 20, 2010

MELONI & McCaffrey, P.C.



By: _____

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*Defendant/Counterclaimant and
Third Party Plaintiff Celebrity Chefs Tours LLC
and Defendant Promark Productions LLC*

SERVICE LIST

- (1) Celebrity Chefs Tours LLC, *Defendant/Counterclaimant and Third Party Plaintiff*
1441 Cottontail Lane
La Jolla, CA 92037
- (2) Promark Productions LLC, *Defendant*
1441 Cottontail Lane
La Jolla, CA 92037
- (3) Lori Marks-Esterman, Esq.
Jennifer L. Heil, Esq.
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Attorneys for Plaintiffs/Counter-Defendants and Third-Party Defendants Paula Deen Enterprises, LLC, Deen Brothers Enterprises, LLC, Paula Deen, Michael Groover, Bobby Deen, v Jamie Deen and Artists Agency, Inc.